

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

VOITH PAPER GMBH & CO. KG	:	
	:	Civil Action No. 07-226-JJF
Plaintiff,	:	
	:	
v.	:	
	:	
JOHNSONFOILS, INC.	:	
	:	
Defendant.	:	

**OBJECTION TO THE FEBRUARY 13, 2008 LETTER TO THE HONORABLE
JOSEPH J. FARNAN, JR. FILED WITH THE COURT BY VOITH PAPER
GMBH & CO. KG**

JohnsonFoils, Inc. ("JohnsonFoils") objects to Plaintiffs use of its February 13 filing (D.I. 88) as an impermissible attempt to supplement briefing on the pending Motion to Stay (D.I. 28). Instead of providing the basic information this Court requested, Voith Paper GmbH & Co. KG's ("Voith") letter brief provides a large amount of data comparing Voith and AstenJohnson, Inc. in the paper machine clothing business. AstenJohnson is not a party and its operations are not relevant to this case.

To address the deficiencies in Voith's filing, JohnsonFoils submits data obtained from Voith's own website identifying sales of €3.7 billions (\$5.4 billion) and over 34,000 employees. See Exhibit A.

JohnsonFoils also objects to Voith's letter brief and declaration as an improper attempt to submit a reply brief without leave of Court.

Respectfully submitted,

Date: February 19, 2008

/s/ George H. Seitz, III

George H. Seitz, III (DE #667)

Patricia Pyles McGonigle (DE
#3126)

Kevin A. Guerke (DE#4096)

Seitz, Van Ogtrop & Green, P.A.

222 Delaware Avenue, Suite 1500

P.O. Box 68

Wilmington, DE 19899

(302) 888-0600

-and-

Anthony S. Volpe

John J. O'Malley

Ryan W. O'Donnell

Volpe and Koenig, P.C.

United Plaza, Suite 1600

30 South 17th Street

Philadelphia, PA 19103

(215) 568-6400

Attorneys for Defendant

JohnsonFoils, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

VOITH PAPER GMBH & CO. KG	:	
	:	Civil Action No. 07-226-JJF
Plaintiff,	:	
	:	
v.	:	
	:	
JOHNSONFOILS, INC.	:	
	:	
Defendant.	:	

NOTICE OF FILING

PLEASE TAKE NOTICE That this 19th day of February, 2008 Defendant has filed the attached Objection to Plaintiff's February 13, 2008 Letter to the Court.

SEITZ, VAN OGTROP & GREEN, P.A.

By: /s/ George H. Seitz
George H. Seitz, III (DE #667)
Patricia Pyles McGonigle (DE #3126)
Kevin A. Guerke (DE#4096)
Seitz, Van Ogtrop & Green, P.A.
222 Delaware Avenue, Suite 1500
P.O. Box 68
Wilmington, DE 19899
(302) 888-0600

-and-

Anthony S. Volpe
John J. O'Malley
Ryan W. O'Donnell
Volpe and Koenig, P.C.
United Plaza, Suite 1600
30 South 17th Street
Philadelphia, PA 19103
(215) 568-6400
*Attorneys for Defendant
JohnsonFoils, Inc.*

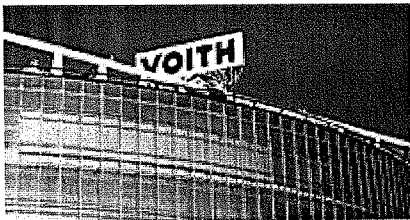
EXHIBIT A



[Home](#) [Voith Group](#) [Deutsch](#)

About Voith

- [Voith - Engineered reliability](#)
- [Organization Structure](#)



Voith. Four Group Divisions - One Group

With over 34,000 employees and sales of over € 3.7 billion, Voith is one of the world's leading companies in the markets paper, energy, mobility and service. For 140 years, technical pioneering feats have been inseparably related with the name Voith.

Voith Paper, Voith Turbo, Voith Siemens Hydro Power Generation and Voith Industrial Services are the four Group divisions that belong to the Voith Group of Companies. Voith AG (the holding company) is responsible for the general business strategies within the Voith Group.

Four Group Divisions - one Group. Also Voith Paper belongs to this strong group and is part of a bigger entirety. And that works out well - for the profit of customers, employees and the other Group Divisions. Because also for Voith applies: The entirety is more than the sum of its parts.

[Note for U.S. residents](#)


[Home](#)
[Deutsch](#)

Company Data

- [Sales](#)
- [Orders received](#)
- [Net Income](#)
- [Capital Expenditures](#)
- [Research](#)
- [Employees](#)

Acquisitions swell workforce

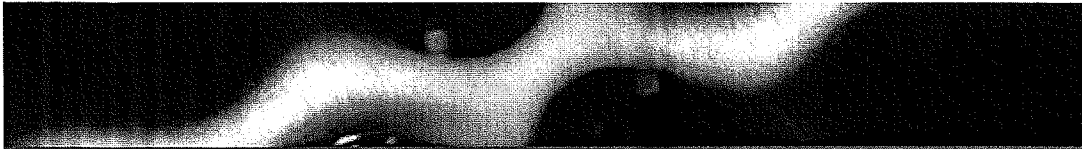
2003	16 153	8 099	24 246
2004	15 992	8 332	24 314
2005	16 546	14 288	30 834
2006	16 677	17 408	34 085

■ Systems & Products ■ Services

Employees on September 30

At the end of September 2006, the Voith Group employed a total of 34 085 people, of which 15 489 (previous year: 13 631) are working in Germany, and 18 596 (17 203) abroad. This is added by 809 (647) apprentices. The figure includes approximately 2 000 employees from companies acquired in fiscal year 2005/2006, most of them from Hörmann Industrietechnik.

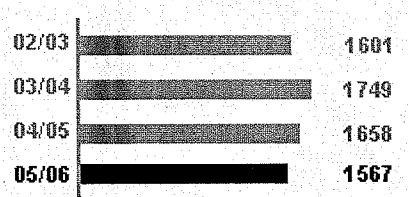
- ⌕ Note for U.S. residents
- ⌕ Your remarks regarding this page



[Home](#)
[Deutsch](#)

- [Company Data](#)
- [Sales](#)
 - [Voith Paper](#)
 - [Voith Turbo](#)
 - [Voith Siemens Hydro](#)
 - [Voith Industrial Services](#)

Slight Drop in Sales As Anticipated



Sales at Voith Paper [EUR in millions]

As expected, sales at Voith Paper edged down from € 1.7 billion in the previous exercise to € 1.6 billion. This slippage was due to the lower order intake in the preceding fiscal year as a whole.

- ⌕ Note for U.S. residents
- ⌕ Your remarks regarding this page

CERTIFICATE OF SERVICE

I, George H. Seitz, III, Esquire, hereby certify that on this 19th day of February 2008, I electronically filed the foregoing pleading with the Clerk of Court using CM/ECF which will send notification of such filing to counsel of record. Further, I caused a copy of the foregoing pleading to be served upon the following counsel as noted.

Via Hand Delivery

Adam W. Poff, Esquire
Young, Conaway, Stargatt & Taylor, LLP
1000 West Street, 17th Floor
P. O. Box 391
Wilmington, DE 19899

Via Federal Express

Neil F. Greenblum, Esquire
Neal Goldberg, Esquire
Michael J. Fink, Esquire
Greenblum & Bernstein, PLC
1950 Roland Clarke Place
Reston, Virginia 20191

/s/ George H. Seitz, III

George H. Seitz, III (ID No. 667)
gseitz@svglaw.com